

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X	
<b>SECURITIES AND EXCHANGE COMMISSION,</b>	:
	:
<b>Plaintiff,</b>	:
	:
<b>– against –</b>	:
	:
<b>BARRY C. HONIG, ROBERT LADD,</b>	:
<b>ELLIOT MAZA, BRIAN KELLER,</b>	:
<b>JOHN H. FORD, GRQ CONSULTANTS, INC.</b>	:
<b>and HS CONTRARIAN INVESTMENTS, LLC,</b>	:
	:
<b>Defendants.</b>	:
-----X	

**STIPULATION AND ~~PROPOSED~~ ORDER**

WHEREAS, pursuant to the Amended Civil Case Discovery Plan and Scheduling Order, entered June 10, 2020 (DE 263), fact discovery in this matter is scheduled to conclude on November 23, 2020; and

WHEREAS, the parties have agreed to conduct depositions by remote means where appropriate, as contemplated by Fed. R. Civ. P. 30(b)(4);

IT IS HEREBY STIPULATED AND AGREED, by and among the parties hereto, that depositions in this matter may be taken by telephone or video-teleconference as set forth in the relevant Notice of Deposition for each deponent.

Dated: New York, NY  
July 23, 2020

ROBERT LADD

By: s/ Adam C. Ford  
Adam C. Ford

Ford O'Brien, LLP  
575 Fifth Avenue, Fl 17  
New York, NY 10017

Attorneys for Defendant Robert Ladd

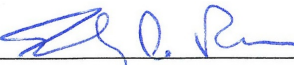
SECURITIES AND EXCHANGE  
COMMISSION

By: s/ Nancy A. Brown  
Nancy A. Brown

200 Vesey Street  
Suite 400  
New York, NY 10281  
212-336-0106

Attorneys for Plaintiff Securities and  
Exchange Commission

SO ORDERED:

  
\_\_\_\_\_  
Edgardo Ramos, U.S.D.J  
Dated: July 23, 2020  
New York, New York